REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 6-12 were pending in this application. Claims 6-12 had been amended and new claims 13 and 14 have been added hereby. Support for the amendment can be found throughout the specification and support for the new claims can be found in, e.g., Figure 2, and pages 3-5 of the specification. No new matter has been presented. Upon entry of this Amendment, claims 6-14 will be pending herein and, for the reasons set forth below, are all believed to be in condition for allowance.

In the Office Action,

- Claims 6-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over Khlat (US 2004/0037379) in view of Hsieh (US 7,260,068); and
- Claims 10-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ormson (US 7,433,709) in view of Hsieh (US 7,260,068).

These grounds of rejection are respectfully traversed.

Applicant respectfully submits that the technical features required by claims 6-9 are not disclosed by Khlat (or Hsieh).

Specifically, Khlat discloses the use of **two accumulator type 1 timers** to **count the time-base related to a GSM network and to a UMTS network respectively**, with each of the timer accumulators being clocked by a 26MHz crystal clock. The accumulators thus effectively constitute separate clocks for the GSM network and the UMTS network respectively. In the system which is the subject of the present application, **a scheduler is provided, which uses a clock signal as a reference signal to calculate the moments when certain actions must be begun or stopped by a GSM subsystem.** The scheduler deduces the correct timing for certain events, and sends commands to the GSM subsystem to cause the appropriate GSM tasks to be carried out at the correct time. Thus, **GSM tasks are not controlled directly by the master clock signal, but instead the GSM subsystem receives commands from the scheduler which**

causes the GSM subsystem to perform the required tasks at the correct time. There is no disclosure in Khlat's patent, either explicit or implicit, of a scheduler which causes commands to be sent to a telecommunications subsystem at an appropriate time. Indeed, as the system of Khlat's patent uses two accumulator timers, there are effectively separate clocks for each subsystem, and thus a scheduler as employed in the system of the present application would be unnecessary.

In addition, the claimed scheduler of the present invention is not analogous to the scheduler identified by the examiner in Hsieh's patent. **The scheduler in the present invention uses a clock signal as a reference signal to calculate the moments when certain actions must be begun or stopped by a GSM subsystem**. The scheduler deduces the correct timing for certain events, and sends commands to the GSM subsystem to cause the appropriate GSM tasks to be carried out at the correct time. In contrast, **the scheduler in Hsieh's patent is used to adjust the predetermined count value**. Specifically, **the scheduler 84 is capable of commanding the hardware driver 80 to run at time t5 to further adjust originally adopted predetermined count value TH1 to TH2**. It is noteworthy that the first count value 75 cannot match the predetermined count value TH1 at time t5 because the difference between time t4 and time t5 is always shorter than each frame time referenced by the base station (see Hsieh, col.12, lines 57-64).

For at least the foregoing reasons, the §103 rejection of claims 6-12 should be reconsidered and withdrawn.

Applicants respectfully submits further that the technical features required by claims 10-12 are not disclosed by Ormson (or Hsieh).

Specifically, a first distinguishing feature between the present invention and Ormson is the use of **a single clock signal.** In comparing the invention and Ormson, it is clear the present application relates to a wireless communications network device using a single clock (see, e.g., page 2, lines 7-14, page 3, lines 22-24 and Figs. 1 and 3), while the mobile radio communications device in Ormson **has three clocks**, i.e., **a first crystal oscillator** for providing a first master clock frequency for a timebase of a first communication system, **a second crystal**

oscillator for providing a second master clock frequency for a timebase of a second communication system, and **a third oscillator** for providing a relatively low frequency clock signal within the device (see Fig. 1 and col. 4, lines 8-20 of Ormson).

A second distinguishing feature between the present invention and Ormson is that the invention advantageously permits a **single clock signal** within the wireless communication network participant to be used for interacting with networks organized according to different standards so that **separate timing signals do not need to be generated for use with different standards**. Moreover, where the wireless communications network participant switches from interacting with a network organized according to one standard to interacting with a network organized according to another standard, the use of a single timing signal **allows the switchover to be implemented efficiently** as the timings required under the different standards are calculated relative to the same clock signal.

In addition, the claimed scheduler of the present invention is not analogous to the scheduler identified by the Examiner in Hsieh's patent. **The scheduler in the present invention uses a clock signal as a reference signal to calculate the moments when certain actions must be begun or stopped by a GSM subsystem**. The scheduler deduces the correct timing for certain events, and sends commands to the GSM subsystem to cause the appropriate GSM tasks to be carried out at the correct time. But **the scheduler in Hsieh's patent is used to adjust the predetermined count value**. Specifically, **the scheduler 84 is capable of commanding the hardware driver 80 run at time t5 to further adjust originally adopted predetermined count value TH1 to TH2**. It is noteworthy that the first count value 75 cannot match the predetermined count value TH1 at time t5 because the difference between time t4 and time t5 is always shorter than each frame time referenced by the base station (see Hsieh, col.12, lines 57-64).

Thus, it is respectfully requested that the §103 rejection of claims 10-12 be reconsidered and withdrawn.

New claims 13 and 14 recite still additional features of the present invention that are not disclosed or suggested by the cited prior art. Specifically, the new claims recite that the claimed

device is configured to determine and record offsets between a first time of the single timing signal and a time of respective boundaries of frame structures of signals received from different base stations. This feature of the present invention is depicted in Figure 2 of the application which shows an arbitrary time t_0, from which several offsets (A, B, C, D) are determined. These offsets correspond to the start of boundaries of the frame structures for respective signals received from different base stations. Since the offsets are stored or recorded in the device, the device can easily adjust the timing for the appropriate subsystem to effectively communicate with a selected base station.

It is respectfully submitted, that none of the prior art of record discloses or even suggests the feature of determining and recording a timing offset that matches boundaries of frame structures that are received from different base stations.

Thus, it is believed that claims 13 and 14 should likewise be allowable over the prior art of record.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

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